

In re:)
GRIGGS AND WALNUT GROUND)
WATER PLUME SUPERFUND SITE,)
Las Cruces, New Mexico)

DECLARATION OF ROLAND FROST

I, Roland Frost, do hereby depose and say in accordance with 28 U.S.C. § 1746:

1. My address is 1965 Rosedale Drive, Las Cruces, NM 88005. My telephone number is 505-524-0343.
2. I am presently retired.
3. From approximately 1962 through 1972, I worked in maintenance control for the 642nd Maintenance Company with the New Mexico National Guard (the "Guard") at the National Guard Armory located at 700 N. Solano in Las Cruces, Doña Ana County, New Mexico (the "Solano Armory"), with rank of E7. I was an instrument supply control repairman, armament mechanic, armament foreman, and organizational foreman at the Solano Armory.
4. I do not remember the precise solvent that I or other Guard personnel used to maintain armament at the Solano Armory, but I definitively recall that all such operations had to be conducted according to applicable federal, military and technical specifications, orders and manuals.
5. I recall some of those specifications, orders and manuals, including lubrication orders, Department of the Army Technical Manual 9-7218, Twin 40-MM Full Tracked Self-Propelled Gun M42 (T141). I also recall the difference between bore cleaner solvent and dry cleaning solvent. I recall that we (Guard personnel) used bore cleaner solvent to clean the gun barrel and the breech. Up to 40 or 50 gun crews at a time used the bore cleaner at the Solano

Armory by dipping a large brush into a drum containing bore cleaner, running the brush from the front of the barrel to the back until it was clean, then placing ^{we} ~~ed~~ parts of the gun into half 55-gallon drums filled with bore cleaner. Some cleaning may have also been performed in the parking area south of the Solano Armory. ^{the} ~~bore cleaner & maybe dry cleaning solvent~~ used solvent was emptied into 55-gallon drums on the east end of maintenance bays. To empty the half 55-gallon drums, we placed a funnel in the opening of a full 55-gallon drum, then poured the contents from the half drum into the full drum. Spilling may have occurred during this activity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 6 day of June, 2009.



Roland Frost